



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

**STRAFFI & STRAFFI, LLC**

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Attorney for Trustee

Order Filed on August 4, 2021  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

In Re:

Brasusa Container & Demolition Services Inc.

Case No.: 21-11678/CMG

Adv. No.:

Hearing Date: August 3, 2021 at 10:00 am

Judge: Honorable Christine M. Gravelle

**ORDER FOR TURNOVER OF COMPUTER AND DOCUMENTS,  
FOR ALLOWANCE OF FEES AND EXPENSES, AND FOR SANCTIONS**

The relief set forth on the following pages, numbered two (2) through n/a is hereby **ORDERED**.

DATED: August 4, 2021

Honorable Christine M. Gravelle  
United States Bankruptcy Judge

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Debtor: Brasusa Container & Demolition Services Inc.

Case No: 21-11678/CMG

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**ORDER FOR TURNOVER OF COMPUTER AND DOCUMENTS,  
FOR ALLOWANCE OF FEES AND EXPENSES, AND FOR SANCTIONS**

THIS MATTER having come before the Court upon application of Daniel E. Straffi, Esq., Trustee, for an Order to compel production of debtor's computer and financial records; for allowance of fees and expenses; and for sanctions; and the Court having reviewed the moving papers and having heard oral argument, if any; and for good cause shown; it is hereby

**ORDERED** as follows:

1. That within five (5) days of the date of this Order, Cristiane Pinto-Rangel a/k/a Cristiane Rangel shall turnover to the Trustee the debtor's computer and financial records as detailed in Exhibit "A";
2. That within five (5) days of the date of this Order, Cristiane Pinto-Rangel a/k/a Cristiane Rangel shall pay the Trustee the sum of \$2,596.66 for fees and expenses incurred in bringing this motion;
3. That Cristiane Pinto-Rangel a/k/a Cristiane Rangel shall be and is sanctioned the sum of \$500.00 per day each day from the date of this Order until she gives the Trustee the company computer and all the company records listed in Exhibit "A" hereto;
4. That the sanctions provided for in Par. 3 hereof shall be paid to the Trustee; and
5. That a copy of this Order shall be served on all parties in interest within 5 days of the date hereof.



**VIA EMAIL**

[Patricia@bestservicesnewark.com](mailto:Patricia@bestservicesnewark.com)

May 21, 2021

Patricia Berrios  
Best Services Network

Re: Brasusa Container & Demolition Services

Dear Patricia:

We received your email response today, May 21, 2021, regarding the 2020 tax return and QuickBook file. My associate Aaron J. Todoroff has responded to you with a Sharefile link to upload these documents.

Your email questions what other documents are needed. Also, you indicate that the client does not have any computers, laptops or electronic invoices/accounts receivable information.

Per our May 19, 2021 letter to the Debtor's principal (copy enclosed), in her hearing with the Trustee, Cristiane Pinto-Rangel indicated that the Debtor's records were kept on a computer. We are awaiting Ms. Pinto-Rangel's response to make arrangements with us to pick up the Debtor's computer as well as the hard copy documents. We have availability next week, May 25<sup>th</sup>, 26<sup>th</sup> or 27<sup>th</sup>.

It has been well over one month since our initial request. We are still missing the following:

**FOR THE PERIOD OF JANUARY 1, 2019 TO THE PRESENT**

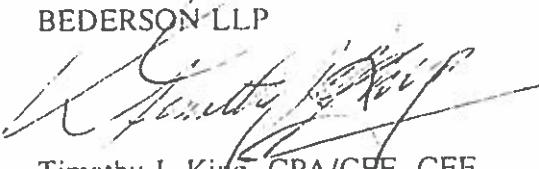
1. All bank statements and canceled checks, debit memos and any other documents for all bank accounts;
2. All account statements for any other bank, brokerage, money market or investment accounts;
3. All 2020 payroll tax returns and payroll journals;
4. All 2020 sales tax returns;
5. Detailed schedules of inventory, accounts receivable, fixed assets, and any other assets at December 31, 2019 December 31, 2020 and most recent;
6. Copies of all financial statements; both internal and prepared by outside accountants;
7. All accounts payable invoices, paid and unpaid;
8. Most recent accounts receivable trial balance and all invoices and supporting documents for any unpaid accounts receivable.
9. The Debtor's computer.

Patricia Berrios  
Brasusa Container & Demolition Services  
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Please advise your client to contact us as soon as possible to retrieve the computer and hard copy records. If you have any questions, please do not hesitate to contact either Aaron Todoroff or me.

Very truly yours,

BEDERSON LLP



Timothy J. King, CPA/CPF, CFE  
Partner

TJK:fs

CC: Cristiane Pinto-Rangel (email)  
Daniel Straffi, Esq. Trustee (email)  
Aaron Todoroff (email)

Brasusa Container and Demolition Services Inc. Correspondence Due Date 08/21/2021 US 21 document required response to a document due 08/21/2021

